## RULE 16 CONFERENCE INFORMATION REPORT

Civil Action No: 2:23-cv	<u>7-00581</u>					
Jury Trial X Bench Trial Arbiti				_		
Service of Process Made	2/15/23					
Caption: ANGHEARA I	ELFSTROM v. BIG PIC	CTURE PHILAD	<u>DELPHI</u>	A		
Trial Counsel: EMILY	<u>MAHLER</u>					
Representing: BIG PICT	<u>'URE PHILADEPLH</u>	<u>IA</u>				
Law Firm: MARGOLIS	<u>EDELSTEIN</u>					
Telephone: 41 <u>2-355-493</u>	38 Fax:	412-642-2380				
E-Mail: emahler@marg	olisedelstein.com_					
Are there threshold moti	ons? <u>No</u>					
When will discovery be	completed? July 22,	2024				
Will motion for summar	y judgment be filed?	Yes _		No X		
Has settlement been disc	ussed?	Yes _	X	No		
If not, why not?						
Future settlement confer	ence requested	Yes _	X	No		
Novel issues or special p	oroblems?	Yes _		No <u>X</u>	If yes, describe.	
Ready for trial by? <u>De</u>	ecember of 2024					
Trial time estimates: Ti	me to present your ca	se <u>1</u>	l-2 days			
Ti	me for entire trial	2	2-3 days			
Date: <u>1/23/24</u>			Signature of counsel			
			Emily Mahler			
			Typed or printed name			

## Case 2:23-cv-00581-MRP Document 9 Filed 01/24/24 Page 2 of 3 Joint Status Report Pursuant to Rule 26(f)

Caption: ANGHEARA ELFSTROM v. BIG PICTURE PHILADELPHIA

Civil Action	No: <u>2:23</u>	3-cv-00581		
Basis of Juris	sdiction:	28 U.S.C. §§ 1331 and	<u>1343</u>	
Jury Trial: _	X	Non-Jury Trial:	Arbitration:	

- 1. Plaintiff's brief factual summation of the case and claims: At <u>all times material</u>, <u>Plaintiff received</u> <u>positive reviews of her performance</u>, <u>occasional praise</u>, and no justifiable discipline. In or around October 2020, <u>Plaintiff disclosed to Defendant's HR department that she was pregnant and that it was a high-risk pregnancy</u>; she disclosed her pregnancy to her supervisor in or around December 2020. <u>Plaintiff was due 5/7/21</u>. Upon disclosing her pregnancy, <u>Defendant began to pretextually discipline Plaintiff</u>, ultimately leading to Plaintiff's termination on January 27, 2021.
- 2. Defendant's brief factual summation of the case, claims, and defenses: <u>Defendant maintains Plaintff</u> was terminated from her position for failure to improve performance after she was placed on a performance improvement plan. Plaintiff was not subjected to discrimination on the basis of her pregnancy or sex. Further, <u>Defendant is able to demonstrate legitimate</u>, non-discriminatory reasons for <u>Plaintiff's termination</u>, namely her failure to meet the expectations of her position.
- 3. Plaintiff's counsel participating in the Rule 16 Conference: Mary Kramer
- 4. Defendant's counsel participating in the Rule 16 Conference: Samantha Hirsch
- 5. When did the parties hold the Rule 26 Conference? January 22, 2024
- 6. When did the parties comply with Rule 26(a)'s duty of self-executing disclosure? In process
- 7. Plan for Discovery:
  - a. The parties anticipate that discovery should be completed within 180 days.
  - b. If you contend the discovery period should exceed 90 days, please explain: <u>Parties are engaged in settlement talks.</u>
  - c. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes, there are none.
  - d. Identify any other discovery issues that should be addressed at the Rule 16 Conference, including limitations on discovery, protective orders needed, or other elements which should be included in a particularized discovery plan: None.
  - e. Does either side anticipate the use of experts? No.

    If yes, what is the proposed deadline for expert discovery?

- 8. Proposed deadline for filing dispositive motions: 30 days after close of discovery
- 9. Approximate date case should be trial-ready: November 1, 2024
  Time for Plaintiff's case: 1-2 days
  Time for Defendant's case: 1-2 days
- 10. Does your client consent to proceeding before a Magistrate Judge for final disposition?
- 11. Is a settlement conference likely to be helpful? Yes (yes/no)

If so, when: Early Yes (yes/no) After Discovery \_\_\_\_ (yes/no)

In addition to being filed in ECF, this 26F report should be emailed to: Perez\_Chambers@paed.uscourts.gov